

## EXHIBIT 208

**From:** Dempsey, Michele [GPSUS]  
**To:** Park, SeWha [GPSUS]; West, Phil [SCGUS]  
**CC:** Mandlewala, Raj [OMP]; Strehlke, Brian [GPSUS]  
**Sent:** 1/18/2017 9:11:27 PM  
**Subject:** RE: MCKESSON AGREES TO PAY RECORD \$150 MILLION SETTLEMENT FOR FAILURE TO REPORT SUSPICIOUS ORDERS OF PHARMACEUTICAL DRUGS

Hello SeWha,

I was doing SOM training to the Customer Service team and started the session with this email. They were the ones that asked who is ensuring when we get an order it is going to a licensed facility, so I appreciate the quick response and will let Pat's group know.

I do have one more question – glad to see there are contingency plans, but since McKesson failed to fill out our SOM questionnaire (choosing only to send us a blanket letter saying they have a Suspicious Order Monitoring program) can we confirm somehow that Concerta, TWC, Ultram or Durogesic were not involved? Our questionnaire if they completed it would have told us if our products were in their SOM program.

Michele

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**From:** Park, SeWha [GPSUS]  
**Sent:** Wednesday, January 18, 2017 1:10 PM  
**To:** West, Phil [SCGUS]; Dempsey, Michele [GPSUS]  
**Cc:** Mandlewala, Raj [OMP]  
**Subject:** RE: MCKESSON AGREES TO PAY RECORD \$150 MILLION SETTLEMENT FOR FAILURE TO REPORT SUSPICIOUS ORDERS OF PHARMACEUTICAL DRUGS

Hello, Michele.

JOM ships Scheduled products/Controlled Substances to McKesson's RDC (Regional Distribution Centers, Olive Branch, MS) and RDC distributes down to their forwarding DCs. So from JOM perspective, we do NOT sell/ship Scheduled products/Controlled Substances direct to McK forwarding DCs. We will review this article with McKesson team to receive any information and actions that are required on our side.

Regards,

SeWha  
Senior Planner, Channel Operations  
**JOM Pharmaceutical Services, Inc. | A Johnson & Johnson Company**  
Office: 908-927-6139  
Mobile: 732-236-5819

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**From:** West, Phil [SCGUS]  
**Sent:** Wednesday, January 18, 2017 11:37 AM  
**To:** Dempsey, Michele [GPSUS]; Park, SeWha [GPSUS]  
**Subject:** RE: MCKESSON AGREES TO PAY RECORD \$150 MILLION SETTLEMENT FOR FAILURE TO REPORT SUSPICIOUS ORDERS OF PHARMACEUTICAL DRUGS

Hi Michele,

This has been ongoing litigation and McKesson has contingency plans in place to leverage their D.C network (over 30 sites) to continue continuity of product.

SeWha is actively engaged with McKesson.

Phil West  
Director, Trade Accounts  
Trade Strategy and Operations  
Johnson & Johnson  
Health Care Systems Inc.

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**From:** Dempsey, Michele [GPSUS]  
**Sent:** Wednesday, January 18, 2017 9:35 AM  
**To:** Park, SeWha [GPSUS]; West, Phil [SCGUS]  
**Subject:** FW: MCKESSON AGREES TO PAY RECORD \$150 MILLION SETTLEMENT FOR FAILURE TO REPORT SUSPICIOUS ORDERS OF PHARMACEUTICAL DRUGS

Can you please advise? Thanks!

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**From:** Mashett, Frank [SCGUS]  
**Sent:** Wednesday, January 18, 2017 11:31 AM  
**To:** Dempsey, Michele [GPSUS]  
**Subject:** MCKESSON AGREES TO PAY RECORD \$150 MILLION SETTLEMENT FOR FAILURE TO REPORT SUSPICIOUS ORDERS OF PHARMACEUTICAL DRUGS

Michele,

Phil West is the Trade Account Director for McKesson and Se Wha Park is the JOM planner.

The two of them would be best to address any questions that you have related to this issue involving McKesson.

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**From:** Dempsey, Michele [GPSUS]  
**Sent:** Wednesday, January 18, 2017 11:27 AM  
**To:** Mashett, Frank [SCGUS]  
**Subject:** FW: MCKESSON AGREES TO PAY RECORD \$150 MILLION SETTLEMENT FOR FAILURE TO REPORT SUSPICIOUS ORDERS OF PHARMACEUTICAL DRUGS

Frank  
Can you confirm whether the Ohio DC listed below is the location we ship schedules and what precautions we should take in order to ensure we don't ship to a location that no longer is allowed to have CS.  
Thanks!

*Michele Dempsey*



Director, Controlled Substance Compliance  
302 345-4621 (Cell)  
[mdempse3@its.jnj.com](mailto:mdempse3@its.jnj.com)

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**From:** U.S. Drug Enforcement Administration [mailto:[dea@public.govdelivery.com](mailto:dea@public.govdelivery.com)]  
**Sent:** Tuesday, January 17, 2017 4:55 PM  
**To:** Dempsey, Michele [GPSUS]  
**Subject:** MCKESSON AGREES TO PAY RECORD \$150 MILLION SETTLEMENT FOR FAILURE TO REPORT SUSPICIOUS ORDERS OF PHARMACEUTICAL DRUGS

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**FOR IMMEDIATE RELEASE**

**Contact: DEA Public Affairs**

**(202) 307-7977**

## Press Release

### MCKESSON AGREES TO PAY RECORD \$150 MILLION SETTLEMENT FOR FAILURE TO REPORT SUSPICIOUS ORDERS OF PHARMACEUTICAL DRUGS

JAN 17 - (Washington, DC) – McKesson Corporation (McKesson), one of the nation's largest distributors of pharmaceutical drugs, agreed to pay a record \$150 million civil penalty for alleged violations of the Controlled Substances Act (CSA), the U.S. Drug Enforcement Administration (DEA) announced today.

The nationwide settlement requires McKesson to suspend sales of controlled substances from distribution centers in Colorado, Ohio, Michigan and Florida for multiple years. The staged suspensions are among the most severe sanctions ever agreed to by a DEA-registered distributor. The settlement also imposes new and enhanced compliance obligations on McKesson's distribution system.

In 2008, McKesson agreed to a \$13.25 million civil penalty and administrative agreement for similar violations. In this case, the government alleged again that McKesson failed to design and implement an effective system to detect and report "suspicious orders" for controlled substances distributed to its independent and small chain pharmacy customers—i.e. orders that are unusual in their frequency, size, or other patterns. From 2008 until 2013, McKesson supplied various U.S. pharmacies an increasing amount of oxycodone and hydrocodone pills, frequently misused products that are part of the current opioid epidemic.

The government's investigation developed evidence that even after designing a compliance program after the 2008 settlement, McKesson did not fully implement or adhere to its own program. In Colorado, for example, McKesson processed more than 1.6 million orders for controlled substances from June 2008 through May 2013, but reported just 16 orders as suspicious, all connected to one instance related to a recently terminated customer.

"This groundbreaking resolution is tough and appropriate and underscores our commitment to hold accountable all DEA registrants, including those who distribute controlled substances," said DEA Acting Administrator Chuck Rosenberg. "DEA is committed to fighting the opioid epidemic with all of the tools at our disposal."

In addition to the monetary penalties and suspensions, the government and McKesson agreed to enhanced compliance terms for the next five years. Among other things, McKesson has agreed to specific, rigorous staffing and organizational improvements; periodic auditing; and stipulated financial penalties for failing to adhere to the compliance terms. Critically, the settlement will require McKesson to engage an independent monitor to assess compliance – the first independent monitor of its kind in a CSA civil penalty settlement.

This was a multi-district investigation that involved the following DEA Field Divisions: Boston Field Division, Chicago Field Division, Denver Field Division, Detroit Field Division, Miami Field Division, New Jersey Field Division, San Francisco Field Division, St. Louis Field Division, and Washington Division Office. The following U.S. Attorneys' Offices participated in the case: Central District of California, Eastern District of California, District of Colorado, Middle District of Florida, Eastern District of Kentucky, Northern District of Illinois, District of Massachusetts, Eastern District of Michigan, District of Nebraska, District of New Jersey, Northern District of West Virginia, and Western District of Wisconsin.

U.S. Attorneys' Offices for the District of Colorado and the Northern District of West Virginia, along with DEA's Office of Chief Counsel and its Diversion Control Division, led the civil settlement negotiations. DEA's Denver, Detroit and Miami Field Divisions and its Washington Division Office led the administrative and civil investigation. The U.S. Department of Justice Criminal Division's Narcotic and Dangerous Drug Section (NDDS) also coordinated and assisted in negotiating certain portions of the settlement. Assistant United States Attorneys Amanda Rocque (Colorado) and Alan McGonigal (NDWV) represented the United States in the civil penalty investigations and negotiations. Associate Chief Counsel Lee Reeves and Senior Attorneys Dedra Curteman, Dana Hill and Krista Tongring represented DEA in the investigations and negotiations. Trial Attorneys Harry Matz and Kirtland Marsh were involved for NDDS.

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